

**IN THE UNITED STATES DISTRICT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	<b><u>FILED UNDER SEAL</u></b>
	)	
<b>v.</b>	)	<b>Case No. 2:19-cr-00013</b>
	)	
	)	<b>Chief Judge Waverly D. Crenshaw, Jr.</b>
<b>GEORGIANNA A.M. GIAMPIETRO</b>	)	<b>Magistrate Judge Alistair E. Newbern</b>

**DEFENSE’S MOTION TO ADOPT SCHEDULING ORDER**

The Defense hereby moves the Court to adopt the following proposed trial schedule with accompanying deadlines. For the reasons set forth in the Defendant’s Opposition to the Governments Supplemental Motion for Complex Case Designation and the Government’s Proposed Scheduling Order. The Defendant’s proposed scheduling order requires this Court to exclude time from the Speedy Trial Act to permit diligent preparation for trial. Even if this Court ultimately decides to designate as complex, the Defense respectfully submits that this Court should adopt the proposed schedule to accord Ms. Giampietro her Ms. Giampietro’s speedy trial rights under the Sixth Amendment.

**Trial Date**

The defense requests that jury selection begin in this case the week of **July 13, 2020**.

**Pretrial Deadlines**

The defense proposes the following pretrial deadlines in this case:

**Rule 16 Discovery**

**January 6, 2020.** Deadline for the government to provide Rule 16 material to the defense

**CIPA Matters**

**December 2, 2019.** Deadline for the Government's CIPA § 4 filing.

**Rule 12(b) Motions**

**February 24, 2020,** Deadline to file Rule 12(b) motions.

**March 23, 2010,** Deadline for Responses to Rule 12 (b) motions.

**April 6, 2020,** Deadline for Replies to Responses to Rule 12(b) motions.

**Week of April 20, 2020,** Hearing on Rule 12(b)(1) motions.

**Expert Notices**

**February 10, 2020,** Deadline for the parties to provide expert notices.

**March 9, 2020,** Deadline for the parties to file Daubert motions.

**March 23, 2020,** Deadline for parties to file responses to expert-related motions.

**March 30, 2020,** Deadline for parties to file replies to responses.

**Evidentiary Motions**

**May 1, 2020,** Deadline for evidentiary motions and notices.

**June 1, 2020,** Deadline for responses to evidentiary motions and notices.

**June 8, 2020,** Deadline for replies to responses.

**Week of June 15,** Hearing on evidentiary motions.

**Jencks**

**June 22, 2020,** Deadline for government production of Jencks material to the defense.

**Jury Instructions**

**June 29, 2020,** Deadline for Jury Instructions.

**Witness List**

**June 29, 2020,** Deadline for Witness List.

**Pretrial Conference**

**July 7, 2019**, Pretrial Conference.

/s/ Charles D. Swift

CHARLES D. SWIFT

*Pro Hac* Attorney for Georgianna Giampietro  
Constitutional Law Center for  
Muslims in America  
833 East Arapaho Rd., Suite 102  
Richardson, TX 75081  
Phone: (972)-914-2507  
Email: [cswift@clcma.org](mailto:cswift@clcma.org)

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2019, a copy of this motion was served via email to Assistant United States Attorney, Ben Schrader, Assistant United States Attorney, Phil Wehby, and NSD Attorney, Jennifer Levy.

/s/ Charles D. Swift

CHARLES D. SWIFT

*Pro Hac* Attorney for Georgianna Giampietro  
Constitutional Law Center for  
Muslims in America  
833 East Arapaho Rd., Suite 102  
Richardson, TX 75081  
Phone: (972)-914-2507  
Email: [cswift@clcma.org](mailto:cswift@clcma.org)